

in the at least one fourth data table, the descriptive information about the subcategory comprises detailed information describing the subcategory.

59. The method of claim 58, wherein:

the detailed information in the at least one third data table comprises a free-form description of the category; and

the detailed information in the at least one fourth data table comprises a free-form description of the subcategory.

60. The method of claim 46, further comprising matching the data structure with a second data structure by matching the identification of the category in the at least one second data table with an identification of the category in the second data structure.

61. The method of claim 49, further comprising matching the data structure with a second data structure by matching the identification of the category and an identification of the subcategory in the at least one second data table with identifications of the category and the subcategory in the second data structure.--

#### REMARKS

The Office Action dated May 23, 2002, has been carefully considered. In response thereto, the Applicant respectfully submits that the application in its present form is in condition for allowance. Accordingly, reconsideration and withdrawal of the outstanding grounds of rejection are respectfully solicited.

At the outset, the Examiner is thanked for the courtesy shown during the telephone interview conducted July 29, 2002. During the interview, the Applicant's representative presented arguments for patentability of the present claimed invention over the applied reference. In response, the Examiner said that in his view, the claims were very broadly written. He

suggested amending the claims to recite matching and to clarify what the descriptive information is. He also argued that the data structure of Fig. 4A of *Kouichi et al* could have been modified to match the present claimed invention.

The telephone election of invention II, claims 42-51, is hereby affirmed.

Claims 42-51 have been rejected under 35 U.S.C. §102(b) as being anticipated by *Kouichi et al*. For the reasons set forth below, the Applicant respectfully traverses.

In the present claimed invention, the second data table stores, among other things, an identification of a category to which an entity belongs. The third data table stores descriptive information about the category. The same can be done for a subcategory in a fourth data table, as recited in dependent claims 45 and 49.

Illustrative examples of the descriptive information and the ID/description tables are given in the originally filed specification on page 38, lines 7-21. The ID/description tables provide detailed descriptions of items that may be identified elsewhere only by name, e.g., of a category. The detailed descriptions can be free-form text descriptions.

The present invention, with the use of such data tables storing descriptive information about a category, offers the following advantage. A user who sees a name of a category or a subcategory may not find the name by itself very helpful in ascertaining what the category or subcategory entails. That user can then request a detailed description of the category or subcategory. In that case, the database server can go to the third data table (or fourth, in embodiments that use one) to retrieve the detailed description and present it to the user.

It is alleged in the Office Action that the database system of *Kouichi et al* includes a third data table storing descriptive information about the category. The Applicant respectfully disagrees. The teachings in the reference cited in the Office Action are merely general

descriptions of the manner in which a relational database system is organized. The Office Action identifies “categories” in the account table 412 of Fig. 4B of the reference; however, there is no third data table storing descriptive information about such “categories.” Instead, only information about the actual entities is stored. For example, actual data for a specific cash account are not at all the same thing as descriptive information about the category “cash.” In that regard, the present claims call for descriptive information about a *category*; descriptive information about the *entity* itself is beside the point. The same applies to the “subcategories” identified in the Office Action.

In Figs. 7A-7D of the reference, it could be asserted that the name of the country and city in the table 706 of Fig. 7B is descriptive information about a category. However, even if that reading were accepted, the database of Figs. 7A-7D of the reference would not be the same as that of the present claimed invention. In Figs. 7A-7D of the reference, the only data table storing an identification of a category would be the link table of Fig. 7D.

As noted above, during the interview, the Examiner argued that the data structure of Fig. 4A of the reference could have been modified to match the present claimed invention. In response, the Applicant respectfully submits that the reference would not have motivated such a modification. It is not sufficient to show obviousness by noting what modifications merely could have been made to the prior art, since it is well settled law that

the mere fact that the prior art could be so modified would not have made the modification obvious unless the prior art suggested the desirability of the modification.

*In re Laskowski*, 10 U.S.P.Q.2d 1397,1398 (Fed. Cir. 1989). In the present case, the Applicant respectfully submits that the only teaching to make the modification proposed by the Examiner comes from the present invention itself.

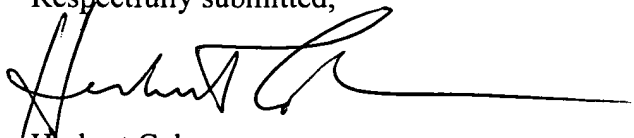
Finally, the Applicant has added claims 52-61 to recite further limitations directed to the specifics of the descriptive information and the matching, as requested by the Examiner during the interview. The Applicant respectfully submits that the new claims depart further from the applied reference. The teachings of the reference identified in the Office Action as descriptive information do not at all resemble the subject matter of new claims 52-59. The teaching in the reference to perform queries does not teach or remotely suggest the matching process recited in new claims 60 and 61.

For the reasons set forth above, the Applicant respectfully submits that all outstanding grounds of rejection have been addressed and overcome and that the application is in condition for allowance. Notice of such allowance is earnestly solicited.

If any issues remain that can be overcome through a telephone communication, the Examiner is invited to telephone the undersigned at the telephone number set forth below.

The Office is authorized to charge any deficiency in fees, or to credit any overpayment thereof, to BLANK ROME COMISKY & MCCAULEY LLP, Deposit Account No. 23-2185 (110273.00102). If a petition for an extension of time is required to render this submission timely and is not filed concurrently herewith or is insufficient to render this submission timely, the Applicant hereby petitions under 37 C.F.R. §1.136(a) for such an extension for as many months as are necessary to render this submission timely. Any fee due is authorized above.

Respectfully submitted,

  
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